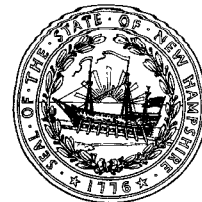




The State of New Hampshire  
*Department of Environmental Services*



Michael P. Nolin  
Commissioner

September 12, 2006

**LETTER OF DEFICIENCY# WSEB 06-139**  
Certified Mail# 7000 1670 0001 2915 6137

Steve Baker  
Willow Grove Corp.  
281A Broadway  
Lawrence, MA 01841

Subject: Newton - Public Water System: Willow Grove Trailer Park (EPA# 1753010)

Dear Mr. Baker:

The records of the Department of Environmental Services (DES) show that the Willow Grove Trailer Park water system is classified as a public water system (PWS), as defined by RSA 485:1-a. A PWS is defined as any water system supplying 15 or more services, or 25 or more people, for 60 or more days per year. As such, the water system is required to submit samples to the State laboratory or a State-certified laboratory for coliform bacteria analysis in compliance with NH Admin. Rule Env-Ws 325.

DES records indicate that the subject water system failed to submit bacteria samples for **April 2005 and July 2006**. As a result Notices of Violation (NOVs) were previously issued for the April 2005 and July 2006 monitoring/reporting violations.

In view of the monitoring/reporting violations, DES believes the deficiencies can be corrected by taking the following action:

1. **By September 30, 2006**, submit the system's routine September bacteria sample to the state laboratory, or a state-certified laboratory, in accordance with NH Admin. Rule Env-Ws 325.

**Please continue to submit monthly bacteria water samples according to the water system's Master Sampling Schedule, a copy of which is enclosed.**

Pursuant to Env-Ws 351, a public water system is required to issue public notification whenever it has failed to monitor for water quality. DES records show that the water system was issued a NOV on June 20, 2006, for a second quarter 2006 Arsenic maximum contaminant level (MCL) violation. The NOV requested that public notice of the arsenic violation be issued within 30 days of the date of the NOV. To date, DES has not received proof of public notice for this violation, thus placing the system in violation of Env-Ws 351.

Although not yet overdue, DES has not received proof of public notice for the July 2006 bacteria monitoring violation as requested in the NOV dated August 25, 2006. DES acknowledges receipt of proof of public notice for the second quarter 2006 lead & copper monitoring violation.

In view of the public notice violation, DES believes the deficiency can be corrected, and future violations prevented, by taking the following actions:

2. **By September 30, 2006**, carry out the public notice requirements for the July 2006 bacteria monitoring/reporting violation, and the Q2-2006 Arsenic MCL violation, in accordance with the instructions on the enclosed public notice templates; and
3. **By October 10, 2006**, provide proof of public notice to DES, in accordance with the instructions on the enclosed public notice templates.

In the event compliance is not achieved within this period, DES may initiate formal action, including issuing an order requiring the deficiencies to be corrected, initiating an administrative fine proceeding, and/or referring the matter to the NH Department of Justice for imposition of appropriate penalties.

Please contact Allyson Gourley by phone at (603) 271-0672 or by e-mail at [agourley@des.state.nh.us](mailto:agourley@des.state.nh.us) if you have any questions regarding this letter.

Sincerely,

**COPY**

Sarah Pillsbury, P.G., Administrator  
Water Supply Engineering Bureau

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encl.: Master Sampling Schedule  
Laboratory Analysis Form  
Public Notice Templates

cc w/o encl.: Gretchen R. Hamel, DES Legal Unit Administrator  
DHHS Bureau of Food Protection/Licensing  
Town of Newton Health Officer  
EPA, Region 1